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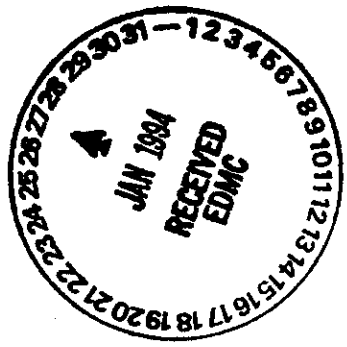
INTERNAL MEMO

June 16, 1989



TO: Roger Stanley
Toby Michelena

FROM: Joe Witczak

SUBJECT: Hanford Site Inspection - June 12-13, 1989

On June 12 and 13, 1989, I conducted a RCRA inspection on the Hanford Reservation. This inspection included the security fence along State Route 240, the 183-H Basins, a tour of B reactor, the S-10 Pond and Ditch, the 4843 Sodium Storage Facility, and the Maintenance and Storage Facility (MASF). A close-out meeting included a 183-H Basins unit managers meeting (UMM), and discussions of 2727-S NRDWSF and the 300 ASE.

I was escorted on June 12 by Fred Ruck and Darren Fleming (both of WHC). We drove out State Route 240 to inspect the facility perimeter fence. Traveling from Richland towards the Yakima Barricade, the fence begins at the Horn Rapids Road intersection and parallels both sides of the road. The fence consists of triple strand barb-wire marked with yellow warning signs every 500 feet. These signs indicate USDOE property and no trespassing but do not warn of radioactive or hazardous dangers. The fence appeared to be continuous and intact up to the Yakima Barricade.

We proceeded to the 183-H Basins and were met by Carol Geier, Ed Powers, and Mike Mihalic (all of WHC). The material for solidification of the basin liquid has been delivered to the site. The batch mixer has been placed in Basin #3 and scaffolding is awaiting placement into the same basin to accommodate solidification operations. Solidification is still scheduled to begin on June 19, 1989 although problems with getting heavy equipment operators on site has caused them to fall slightly behind schedule. Sand-blasting of Basin #1 is complete and equipment is being moved to Basin #4.

I noted a beta-detector at the facility which was not operating. I was informed that these were operated by HEHF and they had discontinued monitoring because they had not detected any beta emissions during sand-blasting operations. They will resume monitoring when solidification begins.

I also noticed two corroded and leaking drums just inside the facility fence by Basin #1. The corrosion was limited to the bottom third of the drums. The drums were filled with decontamination sand and various concrete pieces. Ed said the material in the drums is considered mixed waste and has been stored there through the winter. The leakage went unnoticed because equipment was stacked too close to the outside of the

fence to observe the bottom of the drums. Neither of the drums were lined or covered. The corrosion was most likely caused by precipitation entering the drums and reacting with the nitrate contaminants within the drum. I instructed the WHC staff to 1) repack the drums and move to RMW storage, 2) inspect other drums at the RMW storage which came from this site, and 3) provide an accurate assessment of and reasoning for the corrosion. They agreed.

I then toured B Reactor with Fred, Carol and Darren. We were taken on this tour by "Ralph", who has worked at the site since 1943. Although there are no RCRA TSD's at this location, the tour provided operational and historical information pertinent to all of the reactors at Hanford.

We next went to the S-10 Pond and Ditch where we were met by Mike Coony (WHC). We approached the site from the east but could not discern the pond and ditch from other closely located radioactive ponds, ditches and cribs due to inadequate boundary markings. Furthermore, lack of a four-wheel drive vehicle prohibited us from circling the site to determine the facility's boundaries. A fence indicating radioactivity bordered what we thought to be the pond but was not completely encompassing. The ditch had no fencing. At the head of the ditch, I unearthed a half-buried radioactive surface contamination sign. It was impossible to tell where the sign came from and whether we were standing in or near a contaminated area. We attempted to approach the site from the west side, but still could not determine the site boundaries. I instructed Fred to have the boundaries determined and marked with temporary fencing similar to that recently required at B Pond. I also requested Fred to look into the possibility of displaying the name of these facilities at the boundary. He agreed.

Next we attempted to visit the RCRA sites in the 400 Area. We were met here by Rich Bloom and Eric Root (both of WHC). At the gate we were informed that entry into the area containing MASF requires additional clearance for visitors. This clearance must be requested at least 48 hours in advance. If someone has a Q-clearance, the request can be made a couple of hours in advance. Due to this constraint, I could not get near MASF.

We were able to approach, but not enter, the 4843 FFTF Sodium Storage Facility. Entry requires a key which was not possessed by anyone in our party. I was able to look into the windows of this facility and observed approximately 20 drums and some old equipment parts. Apparently all of the materials in this building are contaminated with radiation and sodium. I was informed that this material can be recycled at the Idaho National Engineering Laboratory, but the state of Idaho will not accept this material if it is labeled as a "waste". In light of the our Departments high regard for recycling, I suggest we investigate this situation further and review the possibility of shipping this material to Idaho.

The second 183-H Basins Unit Manager Meeting (UMM) was held the morning of June 13, 1989. A number of technical and regulatory issues were discussed and will be recorded in the meeting minutes to be compiled by USDOE.

These meeting are proving to be quite useful in the exchange of information, particularly written information. Paperwork can be passed between parties without going through extensive review cycles. We have agreed to nearly every issue concerning the closure plan. WHC/USDOE will resubmit the NOD responses which have changed, based upon our discussions, since their initial submittal. The closure document will be finalized per these responses. We will attempt to get this document out for public comment before I leave for Virginia in mid-August. I told them this would require a resubmittal of this plan to our office by August 1, 1989.

I agreed to their request for a one year extension to the closure date specified in our last NOD. This represents an October 1992 closure. The length of time thus allowed does not necessarily reflect a typical closure time frame but is typical for "the first one out of the gate". This extension allows sufficient time for all parties to administratively implement and control the first closure without the burden of expediting procurement and construction activities. I informed them that future closures must be conducted in a more timely manner.

This meeting was followed by a brief discussion on the 2727-S closure plan. This discussion was attended by Fred, Darren, Nike Naiknimbalkar (WHC) and myself. They agree that the sampling and analysis plan in the last iteration was inadequate and are revising it as per the flow chart we provided in our last NOD.

A final meeting was held on the 300 ASE. We were joined by Jim Hoover and Barry Vedder (both of WHC). They have agreed to core sample the pad associated with the evaporator. The revised sampling plan is going through the WHC review cycle and will be forwarded to me before a July UMM. Their sampling staff had some questions related to background determination for this and other Hanford facilities. I agreed to investigate this issue for them. In response to our NOD comment regarding the notice to be placed in the deed, they found the Hanford Reservation to be composed of many deeds. They feel it would be inappropriate and difficult to combine these into one deed. Their plan is to amend only the deed(s) which a particular closure affects. I told them this seemed appropriate and instructed them to change the wording in their closure plans to address the plurality of deeds.

As part of this discussion, I provided input to their recently submitted NOD response table. We have agreed to most of the responses and I will write a letter responding to their submittal.

The following UMM's were scheduled:

183-H, 300 ASE, 2727-S	July 18, 1989
183-H, Grout	August 15, 1989

cc: 183-H file
300 ASE file
S-10 Pond and Ditch file